

1 place.

2 Q Now, and didn't Mr. Freundlich also state that he  
3 does not believe that Exception 89, an exception related to  
4 data collection, will be closed before the third quarter of  
5 2001?

6 A (Witness Weeks) Yes.

7 Q Okay. And am I correct that Exception 89 relates  
8 to whether the raw data used in the calculation of  
9 BellSouth's SQMs is supported by the early stage data?

10 A (Witness Weeks) I believe it says that the raw  
11 data used in the calculations are not currently accurately  
12 derived or supported by the early stage data.

13 Q Okay. So they're not quite the same; is that  
14 correct?

15 A (Witness Weeks) It's difficult to get from one to  
16 the other.

17 Q And KCI just recently issued a new public  
18 exception on performance metrics; is that correct?

19 A (Witness Weeks) Which -- which one are you  
20 referencing?

21 Q Exception 137.

22 A (Witness Weeks) Okay. It's our most recent.

23 Q Okay. And is it accurate to say that Exception  
24 137 focuses on the issue of whether KCI could compare the  
25 test CLEC data that it created, and whether that accurately

1 compared with the data that BellSouth had for KCI as a test  
2 CLEC?

3 A (Witness Weeks) Yes.

4 Q Okay. And that exception is not yet resolved; is  
5 that correct?

6 A (Witness Weeks) That's correct.

7 Q All right. And then finally, this Commission has  
8 asked you to complete an audit of three months of data  
9 generated by BellSouth based on its January 21, 2001 order;  
10 is that correct?

11 A (Witness Weeks) I believe that's correct.

12 Q Is that audit complete?

13 A (Witness Weeks) No, it is not.

14 Q Okay. Is there an expectation of when that audit  
15 will be complete?

16 A (Witness Weeks) It's not clear, as we sit here  
17 today, exactly when that will be completed.

18 Q All right. I'd like to talk for a minute about  
19 held orders. PMR 2-7-22 evaluated the mean held order  
20 intervals, I believe; is that correct?

21 A (Witness Weeks) If you'll give us a chance to  
22 turn there.

23 Q Sure.

24 A (Witness Weeks) That's in the STP you're  
25 referring to?

1 Q Yes. PMR 2-7-2.

2 A (Witness Weeks) Yes, mean held order interval and  
3 distribution intervals. PMR 2-7-2 talks about the stated  
4 calculation is complete, logical, and consistent with the  
5 definition.

6 Q Okay. And what is a held order?

7 A (Witness Weeks) It's an order that's in a state  
8 somewhere between it has been received by BellSouth and it  
9 has not yet been executed or acted upon by BellSouth.

10 Q And KCI came up with a -- an exception report on  
11 this interval; did they not?

12 A (Witness Weeks) Yes.

13 Q And that exception report was resolved when  
14 BellSouth changed its documentation for what the held order  
15 interval -- how the held order interval would be reported;  
16 is that correct?

17 A (Witness Weeks) Let's look at the closure  
18 statement here.

19 Q Well, it's not really necessary that you look at  
20 the closure statement. Let me restate the question so we  
21 can try and move this along a little bit.

22 Am I correct that the conclusion that the stated  
23 calculation is complete, logical, and consistent with the  
24 definition, is based on a definition which says that  
25 BellSouth will report held order intervals only if they are

1 open at the end of the month?

2 A (Witness Weeks) That's our understanding.

3 Q Okay. So if I'm a CLEC and I submit an order  
4 today and it's closed on May 29<sup>th</sup>, so it's been open for  
5 about three weeks, that would not be reported as a held  
6 order interval in BellSouth's reporting?

7 A (Witness Weeks) That's our understanding.

8 Q Okay. Did you consider, in closing this  
9 exception, whether you should recommend to BellSouth that  
10 they might want to change the way they calculated it, rather  
11 than simply change their documentation?

12 A (Witness Weeks) The answer is that we did not  
13 consider that the definition that was given needed to be  
14 modified as a result of learning that fact.

15 Q Okay. Did you consider, in reviewing the  
16 performance metrics generally, what impact any given metric  
17 might have on a CLEC when you made your recommendations to  
18 BellSouth?

19 A (Witness Weeks) The metrics definitions were  
20 given to us, orders by the Commission and so on. What we  
21 were attempting to demonstrate is whether the company had  
22 implemented the order -- or the metrics in the definitions  
23 that they were given, not to call to question whether the  
24 definitions were accurate or correct or not from a  
25 regulatory perspective.

1           Q     So, if I understand you correctly, you didn't --  
2     in doing the metrics analysis, you didn't consider -- you  
3     didn't differentiate between metrics based on what impact it  
4     might have on CLECs?

5           A     (Witness Weeks) No. We were trying to  
6     fundamentally answer the question: Were the reports that  
7     come out accurate?

8           Q     Okay. And finally, we've talked about some  
9     specific metrics in the Georgia test. But overall, did you  
10    take steps to assure that the interfaces that the CLECs must  
11    use are at parity with the interfaces that BellSouth used  
12    with it -- uses with its own retail customers?

13          A     (Witness Weeks) I don't believe there's anything  
14    in our tests, MTP or STP, that would have addressed that  
15    particular topic.

16          Q     Thank you. I have no further questions.

17               MR. LEMMER: Good afternoon, Commissioners. Tom  
18    Lemmer for AT&T.

19                       FURTHER CROSS-EXAMINATION

20    BY MR. LEMMER:

21          Q     Good afternoon, gentlemen. Few questions  
22    regarding flow-through. And to aid the Commission, we'll  
23    hand out some excerpts from the flow-through report which is  
24    part of the -- the large report that you received. And I  
25    would ask that you all have in front of you the flow-through

1 report.

2 A (Witness Weeks) We have that.

3 Q Would you define for me what the term "flow-  
4 through" means in the context of what was analyzed in this  
5 report that you're looking at.

6 A (Witness Weeks) In general, flow-through refers  
7 to orders that are submitted electronically, that flow  
8 through, back to the service order processing system without  
9 human intervention. And if they do that, then the order is  
10 considered to flow through. If they do not, if they are  
11 submitted electronically and at some point in the process  
12 they kick out or fall out for manual processing by a rep of  
13 BellSouth in the center, then that is an order that would be  
14 characterized as not having flowed through.

15 Q Now, if you'd turn to Page 4 of the flow-through  
16 report, and if you look at the third paragraph that's on  
17 that page, and it says, "A key aspect." Do you see that  
18 paragraph that begins with those words? Says, "A key..."

19 A (Witness Weeks) I see that paragraph; yes.

20 Q It says, "A key aspect of BellSouth's readiness o  
21 support CLEC entry into the local telecommunications market  
22 is the ability of the CLEC's local service request to flow  
23 through BellSouth's OSS." Why is flow-through a key aspect  
24 of BellSouth's readiness to support CLEC entry?

25 A (Witness Weeks) I think it's generally agreed in

1 the industry that the more orders -- order types that can be  
2 eligible for flow-through, the more readily the bonding --  
3 electronic bonding that takes place between the parties can  
4 take place and facilitate larger volumes of order processing  
5 because fewer human beings need to get involved, and the  
6 overall flow of business will be facilitated.

7 Q In preparing this report, did KCI review  
8 BellSouth's systems for flow-through of BellSouth orders  
9 placed with BellSouth?

10 A (Witness Weeks) Yeah, I think I'm struggling with  
11 the question. Could you rephrase it?

12 Q Okay, let me rephrase. In doing work to develop  
13 this report, did KCI review the electronic systems through  
14 which orders placed with BellSouth would flow through?

15 A (Witness Weeks) We didn't review the systems, per  
16 se. If by that you mean performing extensive reviews and  
17 evaluations of the software code and so on on the BellSouth  
18 side, we did look at BellSouth documentation, the things  
19 that would be commercially available to a CLEC, those sorts  
20 of things. So I'm not quite sure the level at which you  
21 meant "review the systems."

22 Q Did you do a -- did KCI did a comparison between  
23 the flow-through achieved with orders placed with BellSouth  
24 versus the flow-through that would be available to CLEC  
25 orders?

1           A       (Witness Weeks)  It's our understanding -- we're  
2   not aware of a retail electronic bonding interface.  So the  
3   notion of flow-through on electronic bonded interface, we  
4   wouldn't believe there was a retail analog for that, so we  
5   wouldn't have made that analysis.

6           Q       Now, the Commission requested that an audit be  
7   performed of flow-through performance data; do you recall  
8   that?

9           A       (Witness Weeks)  Yes.

10          Q       And did KCI perform an audit of BellSouth's flow-  
11   through performance data?

12          A       (Witness Weeks)  Yes.  That is the report that you  
13   referenced earlier.

14          Q       Well, let me ask you to turn to the second and  
15   third page of that report, if you would, please.  And I'm  
16   looking down at the bottom of Page 2 and onto the top of  
17   Page 3.  At the bottom of Page 2 it says KCI, quote, "has  
18   not independently verified to the accuracy or completeness  
19   of the information provided.  Accordingly, KCI expresses no  
20   opinion on such data." Do you see that language?

21          A       (Witness Weeks)  That's correct.

22          Q       So is it a fair interpretation of that language  
23   that KCI did not independently verify information received  
24   from BellSouth for purposes of performing this flow-through  
25   analysis?



1           A     (Witness Weeks) I think it's a more accurate  
2     characterization to say that we did in many cases verify  
3     information in the flow-through reports by comparing and  
4     tracing and tracking information from the pseudo-CLEC and  
5     its transactions, and so there would be cases where we in  
6     fact did do validation; there would be other cases where  
7     representations were made to us by the company which we did  
8     not subject to any kind of validation.

9           Q     And would you give the Commission an example of  
10    the type of information that was not validated.

11          A     (Witness Weeks) Yes. There would have been  
12    certain MNPs in the LCSC, for example, that we took at face  
13    value, the company's representation of how they operated.  
14    And we would just have examined the result that came out of  
15    that process, without actually verifying the company's  
16    statements about how those MNPs worked.

17          Q     Now, if you turn over to the third page, it says,  
18    "KCI has no conducted an audit or review of the historical  
19    data provided to us in accordance with generally accepted  
20    auditing procedures and/or standards promulgated by the  
21    American Institute of Certified Public Accountants." Do you  
22    see that?

23          A     (Witness Weeks) Yes, I do.

24          Q     Is it fair to say that this statement that I just  
25    read from Page 3 of the report states that KCI did not

1 perform an audit of the historical data?

2 A (Witness Weeks) It's our understanding of the  
3 order that it asks for a thorough evaluation as opposed to  
4 an audit, because at the time this work was undertaken, KPMG  
5 Consulting was a portion of KPMG, LLP. We felt that we  
6 needed to make clear disclaimer that this was not an audit  
7 in the AICPA sense of an audit, because the word "audit"  
8 is used rather loosely sometimes. And so we felt it  
9 necessary to distinguish the kind of activity we were doing,  
10 which was a thorough evaluation, from an audit conducted for  
11 financial statement purposes.

12 Q Now, the order from this Commission talks about  
13 the performance of a, quote, "full audit of the percent  
14 flow-through service requests," unquote. Given the language  
15 on the bottom of Page 2 of the report and the top of Page 3  
16 of the report that we've been talking about, is it your  
17 opinion that KCI performed a, quote, "full audit," unquote?

18 A (Witness Weeks) We believe so; yes.

19 MR. LEMMER: Mr. Burgess, I'm handing out a  
20 document that I'd like to be identified as Exhibit 1 for  
21 this hearing.

22 (The documents referred to  
23 were marked for identification  
24 as AT&T Exhibit #1.)

25 BY MR. LEMMER:

1           Q     And I would ask, do you -- do you have a copy in  
2 front of you of what has been identified as Exhibit 1?

3           A     (Witness Weeks) Yes, we do.

4           Q     And do you recognize this document?

5           A     (Witness Frey) Yes.

6           A     (Witness Weeks) Yes.

7           Q     And there is a -- it says, "Prepared by Mr. Steve  
8 Strickland." Is Mr. Strickland...

9           A     (Witness Weeks) Yeah. We're going to ask Mr.  
10 Strickland to step to the microphone so that he can  
11 facilitate the answers to your question.

12          Q     And, Mr. Strickland, is it a fair generalization  
13 of what's in front of you, identified as Exhibit #1, that  
14 this is a step that you performed to evaluate the accuracy  
15 of BellSouth data relating to flow-through?

16          A     (Witness Strickland) Yes.

17          Q     And if you look on -- and I'm looking at the first  
18 page, and the very first line of numbers, says, quote, "From  
19 raw data," unquote. Do you see that?

20          A     (Witness Strickland) Yes.

21          Q     What does that line represent?

22          A     (Witness Strickland) What that represents is the  
23 results that we obtained when we created calculations and  
24 ran our own calculations based on the business rules that we  
25 understood for flow-through, against data captured by

1 BellSouth at the very earliest stages in their process.

2 Q And the raw data that's reflected in that first  
3 line, is that the information that you see beginning on  
4 what's labeled Page 2 on the bottom, that runs for several  
5 pages?

6 A (Witness Strickland) No.

7 Q What's represented on those pages?

8 A (Witness Strickland) What you see there is an  
9 actual subset of the flow-through report as published for  
10 October 1999.

11 Q Now, the second line on the first page has the  
12 word "reported." Do you see that?

13 A (Witness Strickland) Yes.

14 Q The data that's labeled "reported," is that the  
15 information that's found on the page that's identified 8 on  
16 the bottom, that's probably 12 pages into this exhibit?

17 A (Witness Strickland) Yes.

18 Q And so the purpose of the report that we're  
19 looking at is to compare the data that BellSouth was  
20 generating, as shown on Page 8, versus KCI's analysis based  
21 on the raw data that was received from BellSouth; fair  
22 statement?

23 A (Witness Strickland) Yes, in general.

24 Q And the purpose of this was to evaluate the  
25 accuracy of BellSouth's data?

1           A     (Witness Strickland)   Yes.

2           Q     Now, let me show you another document, if I could.

3                 MR. LEMMER:   Okay, Mr. Burgess, I would ask that  
4 this document be identified as Exhibit #2 for this hearing.

5                 COMMISSIONER BURGESS:   Identified as AT&T 2.

6                                 (The documents referred to  
7                                 were marked for identification  
8                                 as AT&T Exhibit #2.)

9 BY MR. LEMMER:

10          Q     And, Mr. Strickland, do you recognize what's been  
11 identified as AT&T Exhibit 2?

12          A     (Witness Strickland)   Yes.

13          Q     Is this a document that you prepared?

14          A     (Witness Strickland)   Yes.

15          Q     And is the reason for preparing this document  
16 similar to why you've prepared what's by identified as  
17 Exhibit #1?

18          A     (Witness Strickland)   Yes.

19          Q     And is the -- the bottom line or the basic intent  
20 of this document to again compare the results of raw data  
21 provided to you versus information BellSouth was providing  
22 on its flow-through statistics?

23          A     (Witness Strickland)   Yes.

24          Q     The statistics that are on the very first page of  
25 Exhibit #2, can you tell me the source of that data?   And

1 I'm looking specifically at the line that's in bold.

2 A (Witness Strickland) Page 2?

3 Q No, first page.

4 A (Witness Strickland) Okay. That would be a flow-  
5 through report provided by BellSouth.

6 Q And if you would turn to Page #9, that has  
7 numbered Page 9 on the bottom. And if you look at --  
8 there's a line of information called "total interfaces,"  
9 on -- on that page. Do you see that?

10 A (Witness Strickland) Yes.

11 Q Should then the numbers that are on Page 9 under  
12 the "total interface" line, should that equal the numbers  
13 that are on Page 1 in bold?

14 A (Witness Strickland) They should; in this  
15 instance they don't.

16 Q And do you know why they don't?

17 A (Witness Strickland) No. I don't believe I  
18 recognize the second document.

19 Q Do you recognize any part of Exhibit 2, other than  
20 the first page?

21 A (Witness Strickland) It resembles a flow-through  
22 document for October, but I don't know if it's the specific  
23 one that I used in my examination.

24 Q Now, you look at this Exhibit 2, there is a number  
25 of pages labeled, "Detail." And then, if you go further

1 into the report -- for example, I just turned to Page 15 --  
2 it says "Residence Detail."

3 A (Witness Strickland) That's correct.

4 Q Do you see that? What is the difference between a  
5 page containing detail and a page containing residence  
6 detail?

7 A (Witness Strickland) To the best of my  
8 understanding, the residence detail is a disaggregate or a  
9 further breakdown of the flow-through calculation.

10 Q Was there any -- did you perform any analysis of  
11 the disaggregated flow-through information to verify the  
12 accuracy of BellSouth's disaggregated flow-through data?

13 A (Witness Strickland) No.

14 Q That's all I have. Thank you.

15 COMMISSIONER BURGESS: Thank you.

16 MR. HILL: Mr. Burgess, since the witness has  
17 testified he only recognizes the first page of this  
18 document, I'd ask that AT&T's Exhibit #2 be amended, and it  
19 be a one-page document consisting only of the first page.

20 COMMISSIONER BURGESS: Response, Mr. Lemmer?

21 MR. LEMMER: If I can ask one question, I believe  
22 I can solve the problem.

23 BY MR. LEMMER:

24 Q If -- Mr. Strickland would correct me if I'm  
25 wrong, but I believe you indicated that the documents or the

1 pages attached to the first page of Exhibit #2 were familiar  
2 to you because you had seen reports like this?

3 A (Witness Strickland) That's correct.

4 MR. LEMMER: On that basis, Mr. Burgess, I would  
5 submit that it's a valid exhibit.

6 COMMISSIONER BURGESS: Mr. Hill, one more time.

7 MR. HILL: Your Honor, he can only identify what  
8 he can identify. He identifies Page 1. I have no idea  
9 where these other pages came from. Neither does Mr.  
10 Strickland. And if AT&T wants to have it in evidence, they  
11 should have someone vouch for it.

12 COMMISSIONER BURGESS: Let me ask you, Mr.  
13 Strickland, did you utilize these other pages in any of your  
14 analysis in coming up with the summary sheet on the front of  
15 this document?

16 WITNESS STRICKLAND: I used similar pages. But  
17 one thing I know for a fact is that the total mechanized  
18 LSRs on the document I used were 341,108.

19 COMMISSIONER BURGESS: So these specific pages  
20 that are attached to this document you did not use in your  
21 analysis in coming up with the summary sheet?

22 WITNESS STRICKLAND: No, sir. No, sir.

23 COMMISSIONER BURGESS: Well, I'm going to, in that  
24 case, then, sustain Mr. Hill's objection, and the parts of  
25 this document that will be allowed in the record will be the



1 summary pages which the witness himself directly was  
2 familiar with and used in his analysis.

3 MR. HILL: Thank you, Mr. Commissioner.

4 MR. LEMMER: Commissioner Burgess, I would notify  
5 you that this document was part of the flow-through report  
6 made to this Commission.

7 COMMISSIONER BURGESS: Yeah, I recognize the  
8 document as being that.

9 BellSouth?

10 MR. ROSS: Thank you, Mr. Chairman.

11 FURTHER CROSS-EXAMINATION

12 BY MR. ROSS:

13 Q Just a few questions about metrics, Mr. Weeks.  
14 There was some discussion at the deposition of Mr.  
15 Freundlich about exclusions that were omitted from  
16 BellSouth's SQMs, and whether it was within the scope of the  
17 third-party audit to bring those issues to BellSouth's  
18 attention. Do you recall those issues?

19 A (Witness Weeks) I do.

20 Q Do you happen to have in front of you a copy of  
21 Closure Exhibit 87?

22 A (Witness Weeks) I can obtain that.

23 (Brief pause)

24 A (Witness Weeks) Okay, we have that.

25 Q And what specifically, just for the record, did

1 this exception deal with?

2 A (Witness Weeks) The explanation that's included  
3 in the report says that the computation instructions  
4 provided by BellSouth for 13 PMAP service quality measures  
5 were not consistent with the information provided in the SQM  
6 reports.

7 Q And if I understand the exception, KPMG had  
8 difficulty replicating, using the instructions that were  
9 given to them in user's manual and the SQMs, to get the same  
10 result; is that a layman's explanation for the issue?

11 A (Witness Weeks) We'll ask Mr. Freundlich to give  
12 the answer. It's too long for me to repeat.

13 A (Witness Freundlich) This exception dealt with a  
14 comparison, for the metrics definition test, of the  
15 computation instructions and the -- and the SQM manual  
16 calculation description.

17 Q And why was that important, Mr. Freundlich?

18 A (Witness Freundlich) That was important -- well,  
19 first, it was part of the metrics definition test PMR 2  
20 scope. And it was important to -- as one of our aspects of  
21 insuring that the computation instructions included the  
22 information that was in the SQM, basically that -- that the  
23 various calculations that were actually being performed were  
24 consistent with the calculation descriptions in the SQM  
25 document itself.

1           Q     And that was within the scope of the third-party  
2 test in Georgia, was it not?

3           A     (Witness Freundlich) Yes, it was.

4           Q     And there were any number of instances where KPMG  
5 identified exclusions that were being applied, but that were  
6 omitted from BellSouth's SQMs, and brought that to  
7 BellSouth's attention; is that correct?

8           A     (Witness Freundlich) That's correct.

9           Q     And, in fact, in -- we don't have to go through  
10 the whole document, but there were several instances,  
11 specifically in relation to Exception 87, for example, if  
12 you would turn over to Page 2 of Exception 87, where -- at  
13 the bottom of the page we're talking about provisioning,  
14 percent provisioning troubles within 30 days of service  
15 order activity. Do you see that?

16          A     (Witness Freundlich) Yes, I do.

17          Q     KPMG identified an inconsistency, in that customer  
18 provided equipment, or CPE, was being excluded, but it  
19 wasn't identified as an exclusion in the SQM; correct?

20          A     (Witness Freundlich) I believe that's correct.

21          Q     And KPMG brought that to BellSouth's attention,  
22 and BellSouth identified that exclusion in order to close  
23 this exception; is that correct?

24          A     (Witness Freundlich) That's right.

25          Q     Do you happen to have Exception 105 in front of

1 you, Mr. Freundlich?

2 A (Witness Freundlich) Yes, I do.

3 Q Is it fair to say this is another instance where  
4 an exclusion was being applied that was not listed in the  
5 SQM reports, and it was brought to BellSouth's attention?

6 A (Witness Freundlich) That's correct.

7 Q And in this case, the exception is talking about  
8 provisioning mean held order interval and distribution  
9 interval where held order duration of greater than 120 days  
10 were being excluded, but that was not specifically listed in  
11 the SQMs; correct?

12 A (Witness Freundlich) That's correct.

13 Q To your knowledge, is Exception 105 open or  
14 closed?

15 A (Witness Freundlich) I believe it is closed.

16 Q And to your knowledge, is it closed because  
17 BellSouth has modified its SQMs to specifically identify  
18 this exclusion?

19 A (Witness Freundlich) I'm sorry, could you repeat  
20 the question, please.

21 Q Yes. To your knowledge, was this exception closed  
22 because BellSouth has modified its SQMs to identify the  
23 exclusion that was listed in Exception 105?

24 A (Witness Freundlich) BellSouth has modified the  
25 calculation code.

1           Q     Okay. Meaning what? The exclusion is being  
2 applied or it's not being applied?

3           A     (Witness Freundlich) They have deleted the  
4 exclusion from the code itself, so it is no longer being  
5 applied.

6           Q     All right. Would it be accurate for anyone to  
7 suggest that KPMG routinely ignored exclusions that were  
8 being applied by BellSouth, but that were omitted from  
9 BellSouth's SQMs?

10          A     (Witness Freundlich) That would not be an  
11 accurate characterization.

12          Q     Thank you. No further question, Mr. Chairman.

13                COMMISSIONER BURGESS: CTAG? No response.

14                Ms. Boone?

15                        FURTHER CROSS-EXAMINATION

16 BY MS. BOONE:

17          Q     Hi. Cathy Boone with Covad Communications. Did  
18 KPMG evaluate the local number portability measures in flow-  
19 through?

20          A     (Witness Weeks) No.

21          Q     Why not?

22          A     (Witness Weeks) It's out of the scope.

23          Q     I'm sorry?

24                COMMISSIONER BURGESS: You got to use that mic,  
25 Mr. Frey, please.



1 pages are removed from the exhibit.

2 COMMISSIONER BURGESS: In accordance with my  
3 ruling, it'll be included as a part of the record. Thank  
4 you.

5 MR. LEMMER: Thank you, Commissioner.

6 (The documents, heretofore marked  
7 as AT&T Exhibits #1 & #2, were  
8 received in evidence.)

9 FURTHER CROSS EXAMINATION

10 BY MR. LEMMER:

11 Q Good afternoon, gentlemen, once again. The  
12 subject we're going to talk about for a bit is billing. And  
13 when we're talking about billing, would it be fair to say  
14 that we're talking about the providing of information to a  
15 CLEC by BellSouth that relates to usage and type of service  
16 used?

17 A (Witness Weeks) Yes, that's part of it.

18 Q What would be the rest of it?

19 A (Witness Weeks) Well, the actual bills that get  
20 rendered to the CLEC from the ILEC.

21 Q So it's the information, plus the electronic or  
22 paper format that transmits that information that  
23 constitutes billing; fair statement?

24 A (Witness Weeks) I think that's fair.

25 Q And with billing, would you agree that accuracy of

1 the information is important to the -- to the CLEC, from the  
2 standpoint that the CLEC has to have accurate bills sent to  
3 the consumer?

4 A (Witness Weeks) I would think accurate  
5 information from the ILEC would greatly contribute to the  
6 accuracy of the bills sent to the consumer.

7 Q And timeliness of the billing information from the  
8 ILEC to the CLEC, would you agree that that would be very  
9 helpful for the CLEC being able to bill its customers on a  
10 timely basis?

11 A (Witness Weeks) Yes.

12 Q And would you agree, based on your experience in  
13 this area, that billing accuracy and timeliness is a --  
14 something of great interest to the consumer?

15 A (Witness Weeks) I would think a consumer would  
16 like the bills to be late and inaccurate in their favor.

17 Q Okay. But conversely, consumers get very upset  
18 when bills are inaccurate not in their favor?

19 A (Witness Weeks) That's a fair characterization.

20 Q And consumers also get upset when bills come in a  
21 year later and they have to pay for a year's worth of  
22 service that they haven't previously paid for?

23 A (Witness Weeks) I think that would depend on  
24 their cash flow model, but...

25 Q The bills that a CLEC renders to consumers



1 generate revenue for the CLEC for its -- its services that  
2 it's providing in the local service market; fair statement?

3 A (Witness Weeks) Yes, the consumer's bill is the  
4 mechanism that the CLEC uses to communicate to the customer  
5 what they owe, and that triggers a payment process. So I  
6 think that's a fair characterization.

7 Q And it's that revenue flow to CLECs that generate,  
8 hopefully for the CLEC, a profit for its local services?

9 A (Witness Weeks) Well, the component that -- talks  
10 about the revenue, it doesn't talk about the cost.

11 Q Well, without the revenue you don't have a profit;  
12 right?

13 A (Witness Weeks) Yes, it's very difficult to have  
14 profit without revenue.

15 COURT REPORTER: Excuse me, Mr. Weeks. Would you  
16 please use the microphone.

17 WITNESS WEEKS: I'm trying to. I apologize.

18 BY MR. LEMMER:

19 Q If you would turn to -- and I -- in Section 6, and  
20 Commissioners, I distributed excerpts from Section 6 to you  
21 that will relate to the pages that we will be taking a look  
22 at. But, gentlemen, if you will turn to Section 6 of the  
23 Master Test Report which relates to billing.

24 A (Witness Weeks) We're there.

25 Q And if you would turn specifically to page Roman